

FILED

JAN 07 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) SUPERSEDING INDICTMENT
)
Plaintiff,) JUDGE PHILIP J. CALABRESE
)
v.) CASE NO. 1:24CR231
CHARIECE CHEW,) Title 18, United States Code,
KATHRYN COE,) Sections 922(a)(6) and 2,
) 922(g)(1), 924(a)(8), 932(b)(1)
Defendants.) and (c)(1)

COUNT 1

(Straw Purchasing of Firearms, 18 U.S.C. §§ 932(b)(1) and (c)(1))

The Grand Jury charges:

1. On or about February 22, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHARIECE CHEW and KATHRYN COE did knowingly conspire in the purchase of two firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-49070, and a Romarm Micro Draco pistol, bearing serial number 23PMD-48829, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at the request or demand of CHARIECE CHEW, knowing he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California; in violation of Title 18, United States Code, Section 932(b)(1) and (c)(1).

COUNT 2

(Making a False Statement in Acquisition of Firearms, 18 U.S.C. §§ 922(a)(6) and 2)

The Grand Jury further charges:

2. On or about February 22, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHARIECE CHEW and KATHRYN COE, in connection with the acquisition of firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-49070, and a Romarm Micro Draco pistol, bearing serial number 23PMD-48829, from Cleveland Armory, 9100 Bank Street, Cleveland, Ohio, a federally licensed dealer of firearms, aiding and abetting each other, did knowingly make and caused to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearms under the provisions of Chapter 44, Title 18 of the United States Code, in that CHARIECE CHEW and KATHRYN COE, aiding and abetting each other did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that KATHRYN COE was the actual buyer of said firearms, when in fact, she was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 2.

COUNT 3

(Felon in Possession of Firearms, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

3. On or about February 22, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHARIECE CHEW, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, knowingly possessed in and affecting

interstate commerce firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-49070, and a Romarm Micro Draco pistol, bearing serial number 23PMD-48829, said firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT 4

(Straw Purchasing of Firearms, 18 U.S.C. §§ 932(b)(1) and (c)(1))

The Grand Jury further charges:

4. On or about February 29, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHARIECE CHEW and KATHRYN COE did knowingly conspire in the purchase of two firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-46205, and a Romarm Mini Draco pistol, bearing serial number 22PG-7029, in or otherwise affecting interstate or foreign commerce for, on behalf of, and at the request or demand of CHARIECE CHEW, knowing he had previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, in violation of Title 18, United States Code, Section 932(b)(1) and (c)(1).

COUNT 5

(Making a False Statement in Acquisition of Firearms, 18 U.S.C. §§ 922(a)(6) and 2)

The Grand Jury further charges:

5. On or about February 29, 2024, in the Northern District of Ohio, Eastern Division, Defendants CHARIECE CHEW and KATHRYN COE, in connection with the acquisition of firearms, to wit: to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-46205, and a Romarm Mini Draco pistol, bearing serial number 22PG-7029, from

Parma Gun Shop, 5907 State Road, Parma, Ohio, a federally licensed dealer of firearms, aiding and abetting each other, did knowingly make and caused to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearms under the provisions of Chapter 44, Title 18 of the United States Code, in that CHARIECE CHEW and KATHRYN COE, aiding and abetting each other did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that KATHRYN COE was the actual buyer of said firearms, when in fact, she was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 2

COUNT 6

(Felon in Possession of Firearms, 18 U.S.C. §§ 922(g)(1) and 924(a)(8))

The Grand Jury further charges:

6. On or about February 29, 2024, in the Northern District of Ohio, Eastern Division, Defendant CHARIECE CHEW, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that being: Possession with Intent to Distribute Methamphetamine, on or about March 20, 2019, in Case Number 3:18-CR-198, in Federal District Court, Northern District of California, knowingly possessed in and affecting interstate commerce firearms, to wit: a Romarm Micro Draco pistol, bearing serial number 23PMD-46205, and a Romarm Mini Draco pistol, bearing serial number 22PG-7029, said

firearms having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.